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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

EN MAY MARITIME LLC,

Plaintiff,

- against -

PROIOS S.A.,

Defendant.

Case No. 24-cv-6738 (PKC)

**NOTICE OF MOTION OF AXIÓN MANAGEMENT SHIP LLC TO
RELEASE FUNDS FROM ATTACHMENT AND VACATE ATTACHMENT ORDER**

Axió Management Ship LLC (“Axió”), by way of this **restricted appearance pursuant to Rule E(8)** of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions of the Federal Rules of Civil Procedure (hereinafter “Supplemental Rules”), by and through its attorneys, upon the accompanying memorandum of law, supporting Declaration of Jorge Proios, Affirmation of Brian P. R. Eisenhower, and exhibits thereto, moves this Court before the Honorable P. Kevin Castel, United States District Judge, for an order releasing all funds that have been attached from Axió’s account(s) by Interaudi Bank, vacating the Process of Maritime Attachment and Garnishment directed to Interaudi Bank, and vacating the Court’s Order Authorizing Issuance of Process of Maritime Attachment and Garnishment dated September 11, 2024, (ECF no. 9). A proposed order is submitted herewith.

Axión requests a prompt hearing at which Plaintiff, En May Maritime LLC, “shall be required to show why the arrest or attachment should not be vacated or other relief granted,” pursuant to Supplemental Rule E(4)(f) and the Court’s order dated September 11, 2024. (ECF no. 9 at 2, Eisenhower Aff. Exhibit B.)

Axión requests all other, further, and different relief to which it may be entitled.

Dated: New York, New York
October 11, 2024

Respectfully submitted,

HILL RIVKINS LLP
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